

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE EQUIFAX, INC. CUSTOMER
DATA SECURITY BREACH
LITIGATION

MDL DOCKET NO. 2800
1:17-md-2800-TWT

CONSUMER CASES

AFFIDAVIT OF LEONARD GREENE

I, Leonard Greene, state and affirm the following:

1. I am an Assistant Director at JND Legal Administration, LLC. JND Legal Administration is a company that provides various legal administration services, including administration services for class action settlements.

2. In my capacity as Assistant Director, I manage and oversee the administration of class action settlements. This affidavit is based on my personal knowledge and experiences working on the matter of *Equifax Inc., Customer Data Security Breach Litigation*, Case No. 1:17-md-2800, before the United States District Court for the Northern District of Georgia.

3. On July 22, 2019, JND Legal Administration was appointed as Settlement Administrator. In its capacity as settlement administrator, JND Legal Administration was responsible for collecting and processing claim submissions,

conducting certain notice functions, and carrying out other administrative functions pursuant to the terms of the Settlement Agreement.

4. In connection with these services, JND Legal Administration established an official settlement website at www.equifaxbreachsettlement.com. The website contains information for class members regarding the settlement agreement, important deadlines, and how to file claims.

5. On September 8, 2019, Elias M Seda filed an online Initial Claims Period claim in the Equifax Data Breach Settlement via the official website (described in the previous paragraph). Mr. Seda was assigned claim number PAUCM-F86PV. Mr. Seda did not provide any documentation with his claim.

6. Attached as Exhibit A is a printed version of Mr. Seda's Initial Claims Period claim. Mr. Seda only requested the Alternative Compensation Payment/Cash Payment. This election was in lieu of receiving the credit monitoring offered under the Settlement. He did not request any Time Spent nor any Out-of-Pocket (Money Spent) losses.

7. Mr. Seda was confirmed as a Class Member, and his claim was reviewed and processed in accordance with the established Equifax Data Breach Settlement procedures.

8. Mr. Seda was deemed eligible for the Alternative Compensation Payment/Cash Payment. On December 22, 2022, he was mailed a check for \$5.21

representing this Benefit to his mailing address on file. The check was cashed or deposited on January 4, 2023.

9. Due to the leftover Settlement Funds, he was eligible for an Additional *Pro Rata* Payment of \$7.44, which was issued to his email address on file on December 20, 2024. According to our records, the email message was accessed, as demonstrated by a logged “Opened” event.

10. Mr. Seda’s Initial Claims Period claim (PAUCM-F86PV) was approved, paid and closed. Mr. Seda made no other claims during the Initial Claims Period.

11. Mr. Seda did not file an Extended Claims Period claim. The deadline to file an Extended Claims Period claim passed on January 22, 2024.

12. All Settlement Class Members remain eligible for free assisted identity restoration services for 7 years after the Settlement’s Effective Date of January 11, 2022.

I solemnly affirm under the penalty of perjury that the contents of this document are true to the best of my knowledge, information, and belief.

Dated: January 16, 2026

A handwritten signature in black ink, appearing to read "Leonard Greene", is written over a horizontal line.

Leonard Greene, Assistant Director
JND Legal Administration

EXHIBIT A

**Must be postmarked
or submitted online
NO LATER THAN
January 22, 2020**

EQUIFAX DATA BREACH SETTLEMENT
C/O JND LEGAL ADMINISTRATION
P.O. BOX 91318
SEATTLE, WA 98111-9418
WWW.EQUIFAXBREACHSETTLEMENT.COM

EFX

Equifax Data Breach Claim Form

SETTLEMENT BENEFITS – WHAT YOU MAY GET

If you are a U.S. consumer whose personal information was impacted by the Equifax data breach announced on September 7, 2017, you may submit a claim.

The easiest way to submit a claim is online at www.EquifaxBreachSettlement.com, or you can complete and mail this claim form to the mailing address above.

You may submit a claim for one or more of these benefits:

Credit monitoring or Cash Payment of up to \$125: Use the claim form to request free credit monitoring services. Or, if you already have credit monitoring services, and will have them for at least six months after filing your claim, you can request a cash payment of up to \$125.

Cash Reimbursement. Use the claim form to request money for one or more of the following:

1. **Reimbursement for Time Spent.** If you spent time trying to avoid or recover from fraud or identity theft because of the Equifax data breach, you can get up to \$25 per hour for up to 10 total hours, or up to 20 total hours if you provide supporting documents.
2. **Reimbursement for Money You Spent.** If you spent money trying to avoid or recover from fraud or identity theft because of the Equifax data breach, you can be reimbursed up to \$20,000. You must submit documents supporting your claim.
3. **Up to 25% Reimbursement for Equifax Credit Monitoring Subscriptions.** If you had an Equifax credit monitoring or identity theft protection subscription between 9/7/2016 and 9/7/2017, you can get a payment of up to 25% of the amount you paid.

No claim is required for **identity restoration services**. U.S. consumers impacted by the Equifax data breach will be able to access identity restoration services for a period of at least 7 years once the Settlement is final. More information is available at www.EquifaxBreachSettlement.com.

* * *

Claims must be submitted online or mailed by 01/22/2020. Use the address at the top of this form for mailed claims.

Please note: the settlement administrator may contact you to request additional documents to process your claim.

Your cash benefit may decrease depending on the number and amount of claims filed.

For more information and complete instructions visit **www.EquifaxBreachSettlement.com**.

Please note that Settlement benefits will be distributed after the Settlement is approved by the Court and final.

Your Information

We will use this information to contact you and process your claim. It will not be used for any other purpose. If any of the following information changes, you must promptly notify us by emailing info@EquifaxBreachSettlement.com.

1. NAME (REQUIRED):	First ELIAS	Middle Initial M	Last SEDA
2. ALTERNATIVE NAME(S) (IF ANY):			
3. MAILING ADDRESS (REQUIRED):	Street Address [REDACTED]		
	Apt. No. [REDACTED]		
	City [REDACTED]		
	State [REDACTED]		
	Zip [REDACTED]		
4. PHONE NUMBER:	[REDACTED]		
5. EMAIL ADDRESS:	[REDACTED]		
6. YEAR OF BIRTH (REQUIRED)	[REDACTED]		

Credit Monitoring: Free Service or Cash Payment

You may be eligible to receive free credit monitoring or up to \$125 if you already have credit monitoring.

You can receive free, three-bureau credit monitoring at all three national credit reporting agencies (Equifax, Experian, and TransUnion). Experian will provide this service for at least four years. You can also enroll in free, single-bureau credit monitoring of your Equifax credit file, provided by Equifax, for up to six years after the Experian service ends.

Or, if you have credit monitoring services that you will keep for at least six months, you can request a cash payment of up to \$125. ***Your payment may be less, depending on the number and amount of claims filed.***

Please select either Option 1 or Option 2 below, but not both.

☐ **Option 1, Credit Monitoring:** I want to receive free, three-bureau credit monitoring.

If you select this option, you will be sent instructions and an activation code after the settlement is final to your email address or home address. You won't be "upsold" any services by enrolling or otherwise asked to submit any payment for these services now or in the future.

If You selected Option 1, would you like to sign-up for Equifax's free, one-bureau credit monitoring service for up to 6 more years after the initial, three-bureau credit monitoring services expire?

☐ Yes.

If you select "yes" for this option, you will be sent instructions to your email address or your home address before your three-bureau credit monitoring expires. You won't be "upsold" any services by enrolling or otherwise asked to submit any payment for these services now or in the future.

☒ **Option 2, Cash Payment:** I want a cash payment of up to \$125. I certify that I have credit monitoring and will have it for at least 6 months from today.

Name of Credit Monitoring Service that you now have and will have for at least six months:

Credit karma

If you select this option, you cannot also enroll in the free, three-bureau credit monitoring service offered through this Settlement.

Cash Payment: Time Spent

If you spent time trying to recover from fraud or identity theft caused by the data breach, or if you spent time trying to avoid fraud or identity theft because of the data breach (placing or removing credit freezes on your credit files or purchasing credit monitoring services), complete the chart below. You can be compensated up to \$25 per hour for up to 20 hours. ***Your payment may be less, depending on the number and amount of claims filed.***

If you claim **10 hours or less**, you **must** describe the actions you took in response to the data breach and the time each action took.

If you claim **more than 10 hours total**, you **must** describe the actions you took in response to the data breach *and* include supporting documents showing fraud, identity theft, or other misuse of your personal information.

By filling out the boxes below, you are certifying that the time you spent doesn't relate to other data breaches.

Explanation of Time Spent (Identify what you did and why)	Approx. Date(s)	Number of Hours and Minutes	Supporting Documentation? (Y/N)
		Hours: Minutes:	
		Hours: Minutes:	
		Hours: Minutes:	

Cash Payment: Money You Lost or Spent

If you lost or spent money trying to prevent or recover from fraud or identity theft caused by the Equifax data breach and have not been reimbursed for that money, you can receive reimbursement for up to \$20,000 total.

It is important for you to send documents that show what happened and how much you lost or spent, so that you can be repaid (except for money you may have spent on Equifax subscription products as explained below). If they are the same as the documents you attached in the section above, you do not need to send them again.

To look up more details about how cash payments work, visit www.EquifaxBreachSettlement.com or call toll-free 1-833-759-2982. You will find more information about the types of costs and losses that can be paid back to you, what documents you need to attach, and how the Settlement Administrator decides whether to approve your payment.

Loss Type and Examples of Documents	Amount and Date	Description of Loss or Money Spent and Supporting Documents (Identify what you are attaching, and why it's related to the Equifax breach)
Costs for freezing or unfreezing your credit report on or after 9/7/2017 <i>Examples: Receipts, notices, or account statements reflecting payment for a credit freeze</i>	\$ Date:	
Credit monitoring and identity theft protection purchased between 9/7/2017 and the date of your claim submission <i>Examples: Receipts or statements for credit monitoring services</i>	\$ Date:	
Costs incurred for an Equifax credit or identity theft monitoring subscription products I had between 9/7/2016 and 9/7/2017 <i>Equifax will check its records and these claims will be paid without documentation if Equifax's records match your claim. You may still submit receipts of statements for Equifax credit monitoring services to support your claim</i>	\$ Date:	

<p>Costs, expenses, and losses due to identity theft, fraud, or misuse of your personal information on or after 05/13/2017</p> <p><i>Examples: Account statement with unauthorized charges highlighted; police reports; IRS documents; FTC Identity Theft Reports; letters refusing to refund fraudulent charges; credit monitoring services you purchased</i></p>	<p>\$</p> <p>Date:</p>	
<p>Professional fees paid to address identity theft on or after 5/13/2017</p> <p><i>Examples: Receipts, bills, and invoices from accountants, lawyers, or others</i></p>	<p>\$</p> <p>Date:</p>	
<p>Other expenses such as notary, fax, postage, copying, mileage, and long-distance telephone charges related to the data breach</p> <p><i>Examples: Phone bills, receipts, detailed list of places you traveled (i.e. police station, IRS office), reason why you traveled there (i.e. police report or letter from IRS re: falsified tax return) and number of miles you traveled</i></p>	<p>\$</p> <p>Date:</p>	

How You Would Like to Receive Your Cash Payment

If you made a claim for a cash payment in this claim form, you can elect to receive your payment either by check or pre-paid card to your mailing address.

Checks must be cashed within 90 days. If you select a pre-paid card, the card never expires.

Which do you prefer?

☒ Check

☐ Pre-Paid Card

Signature

I affirm under the laws of the United States that the information I have supplied in this claim form and any copies of documents that I am sending to support my claim are true and correct to the best of my knowledge.

I understand that I may be asked to provide more information by the claims administrator before my claim is complete.

Signature:

Elias M Seda

Dated:

9/8/2019

Print Name:

ELIAS M SEDA